



**Winston H. Hickox**  
*Secretary for  
Environmental  
Protection*

# State Water Resources Control Board

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## Division of Clean Water Programs

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**Gray Davis**  
*Governor*

April 24, 2000

To: All Local Underground Storage Tank Program Managers and CUPA Agencies

### ENFORCEMENT ALERT

The purpose of this advisory is to request your cooperation in discovering violations of the 1998 UST upgrade requirements.

The primary focus of our concern is single-wall underground product piping connected to tank systems. In the past few months, inspectors in both Sacramento and Los Angeles Counties have conducted special inspections on dispensers at gas stations. Inspectors removed the dispenser cover to the piping that carries product from the tank to the dispenser pump to determine if the visible portion of the piping going into the backfill is steel or fiberglass. An additional area of concern is the steel piping between the turbine head and the tank, which may not be properly protected against corrosion or isolated in a containment box. Of course, steel piping without corrosion protection violates upgrade requirements.

Unfortunately, what the inspectors have found to date is cause for alarm. In the majority of cases, the product piping material is steel, not fiberglass. Upgrade certificates were issued to these stations based on self-certifications to the local agency by owners or operators who certified that the piping material was fiberglass. San Joaquin County inspectors had previously conducted inspections with similar findings.

Sacramento County inspectors and an inspector from the State Air Resources Board have verified the continued use of unprotected steel piping by being present during excavations, observing, and photographing the uncovered piping. The violations already found in isolated, random inspections at either end of the state may be an indicator of widespread problems.

We urge you to make every effort to have an inspector present with a camera to observe and photograph the piping whenever a tank system is being excavated. Report any obvious violations (such as bare, unprotected steel piping) to our office immediately. The information you provide may be used to prepare a case referral to the appropriate prosecutorial agency.



All Local Underground Storage  
Tank Program Managers and  
CUPA Agencies

-2-

Please contact Barbara Wightman at (916) 227-4318 (on vacation until June 7) or Mary Drewry at (916) 227-4483 if you have information regarding upgrade violations.

Sincerely,

Elizabeth L. Haven, Manager  
Underground Storage Tank Program

cc: Niloufar Glosson, California Project Officer  
U.S. Environmental Protection Agency  
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